

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

FILED
IN CLERKS OFFICE

2004 SEP 24 A 9 15

U.S. DISTRICT COURT
DISTRICT OF MASS.

BRANDON ASSOCIATES, LLC
Plaintiff

v.

FAILSAFE AIR SAFETY SYSTEMS
CORP., BLUE SAGE CONSULTING,
INC., EICON MEDICAL,
DEBRA ESPE, ALAN FEUERSTEIN
Defendants

CIVIL ACTION

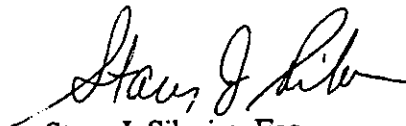
NO. 04 12013NMG

MOTION TO AMEND THE VERIFIED COMPLAINT AND ACTION TO REACH AND
APPLY

Pursuant to Rule 15(a) of the Federal Rules of Civil Procedure, the Plaintiff Brandon Associates, LLC hereby moves to amend its Verified Complaint and Action to Reach and Apply. The original complaint was filed in Massachusetts Superior Court on September 8, 2004.

Respectfully Submitted,

Brandon Associates, LLC
By its Attorney,



Stacy J. Silveira, Esq.
BBO No. 650675
General Counsel
Brandon Associates, LLC
160 Commonwealth Avenue
Boston, MA 02116
(617) 695-8949

Dated: September 23, 2004